



U.S. Department of Justice

Civil Division
Federal Programs Branch

ELIZABETH B. LAYENDECKER
TRIAL ATTORNEY

1100 L Street NW
Washington, DC 20005
elizabeth.b.layendecker@usdoj.gov
(303) 616-5046

March 19, 2025

Via ECF

Hon. Christine P. O'Hearn, U.S.D.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re: *Ireland v. Hegseth, et al*, No. 25-cv-01918
Consent Request for Leave to File Overlength Brief in Opposition to
Plaintiffs' TRO**

Dear Judge O'Hearn

Defendants Secretary of Defense Pete Hegseth, Acting Secretary of the Air Force Gary Ashworth, and the United States Air Force hereby request leave from the page limit set by Local Civil Rule 7.2(d) for Defendants' forthcoming opposition to Plaintiffs' Motion for a Temporary Restraining Order. Defendants seek to increase the page limit from 30 pages to 40 pages in a 12-point proportional font. There is good cause for this request. Plaintiffs have filed a 40-page brief in a proportional font. To adequately respond to that brief, Defendants anticipate needing a proportionate extension of the page limitation. Defendants further believe that the extension will assist the Court in deciding the TRO motion. Defendants' counsel have conferred with Plaintiffs' counsel, who indicated that they consent to this request.

Should this proposal be acceptable to Your Honor, we respectfully request that you "so order" this letter and have the Clerk's Office file it on the docket. Thank you very much for your consideration of this request.

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General

ALEXANDER K. HAAS
Director, Federal Programs Branch

JEAN LIN
Special Litigation Counsel

By: /s/ Elizabeth B. Layendecker
ELIZABETH B. LAYENDECKER
JOHN ROBINSON
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington D.C. 20005
(202) 616-5046
Attorneys for Federal Defendants

cc: All counsel of record (via ECF)